

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
RONALD A. PEREZ :
DENISSE PEREZ : CHAPTER 13
Debtor :
:
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE : CASE NO. 5-25-bk-01626
Movant :
:
RONALD A. PEREZ :
DENISSE PEREZ :
Respondent :
:

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 14th day of July 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid (mortgage arrearage amount not estimated).

WHEREFORE, Trustee alleges and avers that Debtor(s)' Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s)' Plan.
- b. Dismiss or convert Debtor(s)' case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 14th day of July 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

PAUL MURPHY-AHLES ESQUIRE
DETHLEFS, PYKOSH & MURPHY
2132 MARKET STREET
CAMP HILL, PA 17011-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee